

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

UNITED STATES, *et al.*,

*Plaintiffs,*

vs.

GOOGLE LLC,

*Defendant.*

No. 1:23-cv-00108-LMB-JFA

**GOOGLE LLC'S SEALING RESPONSE TO PLAINTIFFS' MOTION TO SEAL  
PLAINTIFFS' MEMORANDUM IN OPPOSITION TO GOOGLE'S  
MOTION TO STRIKE THE JURY DEMAND AND TO DISMISS**

Plaintiffs filed a motion to seal portions of their Memorandum in Opposition to Google's Motion to Strike the Jury Demand and to Dismiss ("Opposition") (Dkt. No. 689). Several portions of the Opposition are redacted (Dkt. No. 688, filed under seal as Dkt. 690). Plaintiffs redacted references to certain but-for revenue share and damages figures, and other figures, derived from information that Google has designated as confidential or highly confidential. As a result, Plaintiffs filed the Opposition under seal in accordance with their obligations under the protective order. (Dkt. No. 691). After reviewing the unredacted Opposition, Google has determined not to seek continued sealing of the but-for revenue share and damages numbers, and other figures, contained in the Opposition. Therefore, Google consents to the unsealing of the Opposition and the filing of an unredacted version of the Opposition in the public record.

Dated: June 6, 2024

Eric Mahr (pro hac vice)  
Andrew Ewalt (pro hac vice)  
Julie Elmer (pro hac vice)  
Lauren Kaplin (pro hac vice)  
Scott A. Eisman (pro hac vice)  
Jeanette Bayoumi (pro hac vice)  
Claire Leonard (pro hac vice)  
Sara Salem (pro hac vice)  
Tyler Garrett (VSB # 94759)  
FRESHFIELDS BRUCKHAUS  
DERINGER US LLP  
700 13th Street, NW, 10th Floor  
Washington, DC 20005  
Telephone: (202) 777-4500  
Facsimile: (202) 777-4555  
eric.mahr@freshfields.com

Daniel Bitton (pro hac vice)  
AXINN, VELTROP & HARKRIDER LLP  
55 2nd Street  
San Francisco, CA 94105  
Telephone: (415) 490-2000  
Facsimile: (415) 490-2001  
dbitton@axinn.com

Bradley Justus (VSB # 80533)  
AXINN, VELTROP & HARKRIDER LLP  
1901 L Street, NW  
Washington, DC 20036  
Telephone: (202) 912-4700  
Facsimile: (202) 912-4701  
bjustus@axinn.com

Respectfully submitted,

/s/ Craig C. Reilly  
Craig C. Reilly (VSB # 20942)  
THE LAW OFFICE OF  
CRAIG C. REILLY, ESQ.  
209 Madison Street, Suite 501  
Alexandria, VA 22314  
Telephone: (703) 549-5354  
Facsimile: (703) 549-5355  
craig.reilly@ccreillylaw.com

Kannon K. Shanmugam (pro hac vice)  
Karen L. Dunn (pro hac vice)  
Jeannie S. Rhee (pro hac vice)  
William A. Isaacson (pro hac vice)  
Amy J. Mauser (pro hac vice)  
Martha L. Goodman (pro hac vice)  
Bryon P. Becker (VSB # 93384)  
Erica Spevack (pro hac vice)  
PAUL, WEISS, RIFKIND, WHARTON &  
GARRISON LLP  
2001 K Street, NW  
Washington, DC 20006-1047  
Telephone: (202) 223-7300  
Facsimile (202) 223-7420  
kdunn@paulweiss.com

Meredith Dearborn (pro hac vice)  
PAUL, WEISS, RIFKIND, WHARTON &  
GARRISON LLP  
535 Mission Street, 24th Floor  
San Francisco, CA 94105  
Telephone: (628) 432-5100  
Facsimile: (202) 330-5908  
mdearnborn@paulweiss.com

Erin J. Morgan (pro hac vice)  
PAUL, WEISS, RIFKIND, WHARTON &  
GARRISON LLP  
1285 Avenue of the Americas  
New York, NY 10019-6064  
Telephone: (212) 373-3387  
Facsimile: (212) 492-0387  
ejmorgan@paulweiss.com

*Counsel for Defendant Google LLC*